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Attorneys for Defendants
TRAVIS MOREDA DAIRY and TRAVIS
MOREDA

UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF CALIFORNIA

CALIFORNIANS FOR ALTERNATIVES TO
TOXICS,

Plaintiff,

vs.

TRAVIS MOREDA DAIRY and TRAVIS
MOREDA,

Defendants.

Case No. 3:24-CV-06632-SI

**STIPULATED REQUEST FOR ORDER
EXTENDING DEADLINES SET BY
COURT (L.R. 6-1, 6-2); [PROPOSED]
ORDER *AS AMENDED BY THE
COURT***

*[Filed concurrently with Declaration of
Alexander Moore]
Assigned for all purposes to the
Honorable Susan Illston*

STIPULATION

Pursuant to Local Rules 6-1 and 6-2, as supported by the accompanying Declaration of Alexander Moore, Plaintiff Californians for Alternatives to Toxics (“CATs”) and Defendants Travis Moreda and Travis Moreda Dairy (collectively “TMD,” and together with CATs, the “Parties”) through undersigned counsel hereby stipulate and respectfully request that the Court extend all deadlines currently set by the Court by sixty (60) days. The Parties declare in support of this request:

WHEREAS, on November 22, 2024, the Court granted TMD’s Motion to Extend Time, extending TMD’s time to respond to CATs’ Complaint from November 25, 2024 to December 27, 2024, and extending all deadlines set by the Court’s Initial Case Management Scheduling Order and ADR Deadlines by 30 days (ECF No. 11);

WHEREAS, on January 2, 2025, the Court granted TMD’s Unopposed Motion for Extension of Time to File Answer, extending TMD’s time to file its Answer from December 27, 2024 to December 30, 2024 (ECF No. 15);

WHEREAS, on January 22, 2025, the Parties met and conferred pursuant to Federal Rule of Civil Procedure 26(f);

WHEREAS, also on January 22, 2025, the Parties each timely filed the ADR Certification;

WHEREAS, the Parties have engaged in settlement discussions, and CATs is preparing a settlement proposal for TMD’s review; and

WHEREAS, the Parties each commit to a good-faith effort to resolve this case within 60 days to conserve the expenditure of attorneys’ fees and costs in litigation, and therefore the Parties agree to seek a 60-day extension to all deadlines currently set by Court order.

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1 WHEREFORE, the Parties hereby stipulate and respectfully request that the
2 Court extend all case deadlines as follows:

- 3 (1) The deadline for the Parties to make initial disclosures will be extended
4 from February 3, 2025 to April 4, 2025;
- 5 (2) The deadline for the Parties to file their Joint Case Management Statement
6 will be extended from February 7, 2025 to April 11, 2025; and
- 7 (3) The date for the Court to hold its initial Case Management Conference will
8 be extended from February 14, 2025 to April 18, 2025.
- 9 (4) Counsel will register for Zoom appearances by email to
10 sicrd@cand.uscourts.gov by 4/9/2025.

11 Dated: January 27, 2025

Respectfully submitted,

KING & SPALDING LLP

13 By: /s/ Alexander Moore
Alexander Moore

14 *Attorneys for Defendants*

16 Dated: January 27, 2025

LAW OFFICE OF WILLIAM CARLON

18 By: /s/ William N. Carlon
William N. Carlon

Signature authority
granted via email
on 1/27/2025

19 *Attorneys for Plaintiff*

21 **PURSUANT TO STIPULATION, AND GOOD CAUSE SHOWN, IT IS SO**
22 **ORDERED.**

24 Dated: January 27, 2024

23 

25 Honorable Susan Illston
26 United States District Judge

ATTESTATION

Pursuant to Civil L.R. 5-1(i)(3), I hereby attest that all signatories listed, and on whose behalf this filing is submitted, concur in the filing's content and have authorized the filing.

Dated: January 27, 2025

KING & SPALDING LLP

By: /s/ Alexander Moore
Alexander Moore

Attorneys for Defendants

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UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF CALIFORNIA

CALIFORNIANS FOR ALTERNATIVES TO
TOXICS,

Plaintiff,

vs.

TRAVIS MOREDA DAIRY and TRAVIS
MOREDA,

Defendants.

Case No. 3:24-CV-06632-SI

**DECLARATION OF ALEXANDER
MOORE IN SUPPORT OF
STIPULATED REQUEST FOR ORDER
EXTENDING DEADLINES SET BY
COURT (L.R. 6-1, 6-2)**

*[Filed concurrently with Stipulated
Request]*

*Assigned for all purposes to the
Honorable Susan Illston*

DECLARATION OF ALEXANDER MOORE

I, Alexander Moore, declare and state as follows:

1. I am an associate at King & Spalding LLP and am licensed to practice law in the State of California. I represent Travis Moreda and Travis Moreda Dairy (collectively, “TMD”) in the above-captioned matter. I have personal knowledge of the facts set forth herein, and if called as a witness I could and would competently testify thereto.

2. On November 22, 2024, the Court granted TMD’s Motion to Extend Time, extending TMD’s time to respond to the Complaint from November 25, 2024 to December 27, 2024, and extending all deadlines set by the Court’s Initial Case Management Scheduling Order and ADR Deadlines by 30 days (ECF No. 11).

3. On January 2, 2025, the Court granted TMD’s Unopposed Motion for Extension of Time to File Answer, extending TMD’s time to file its Answer from December 27, 2024 to December 30, 2024 (ECF No. 15).

4. On January 22, 2025, Plaintiff Californians for Alternatives to Toxics (“CATs,” and collectively with TMD, the “Parties”) and TMD met and conferred pursuant to Federal Rule of Civil Procedure 26(f).

5. Also on January 22, 2025, the Parties each timely filed the ADR Certification.

6. The Parties have engaged in settlement discussions, and CATs is preparing a settlement proposal for TMD’s review.

7. The Parties have each committed to a good-faith effort to resolve this case within 60 days to conserve the expenditure of attorneys’ fees and costs in litigation, and therefore the Parties agree to seek a 60-day extension to all deadlines currently set by Court order.

1 I declare under penalty of perjury under the laws of the United States of
2 America that the foregoing is true and correct.

3 Executed this 27th day of January 2025, in Oakland, California.

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6 Alexander Moore
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